

THE HONORABLE BRIAN A. TSUCHIDA

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CHRISTOPHER J. HADNAGY, an
individual; and SOCIAL-ENGINEER,
LLC, a Pennsylvania limited liability
company,

Plaintiffs,

v.

JEFF MOSS, an individual; DEF CON
COMMUNICATIONS, INC., a Washington
corporation; and DOES 1-10; and ROE
ENTITIES 1-10, inclusive,

Defendants.

No. 2:23-cv-01932-BAT

**JOINT STIPULATION FOR MOTION TO
DISMISS BRIEFING SCHEDULE**

Plaintiffs Christopher Hadnagy and Social-Engineer LLC (collectively, “Plaintiff”) by
and through their counsel of record, Riklis Law, PLLC and Defendants Jeff Moss and Def Con
Communications (“Defendants”) by and through their counsel of record, Perkins Coie LLP,
hereby stipulate as follows:

1. Plaintiff filed its Complaint in the Eighth Judicial District Court in and for Clark
County, Nevada, Case No. A-23-875618-C on August 9, 2023.
2. Defendants were served with the Complaint on August 10, 2023.
3. Defendants filed their Notice of Removal to the District of Nevada, Case No.
2:23-cv-01345-CDS-BNW on August 29, 2023.

JOINT STIPULATION FOR MOTION TO DISMISS
BRIEFING SCHEDULE – 1 (No. 2:23-cv-01932-BAT)

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

4. Defendants filed their Motion to Dismiss on October 2, 2023, and their Motion to Transfer to the Western District of Washington on October 16, 2023.

5. On December 12, 2023, the U.S. District Court for the District of Nevada granted Defendants' Motion to Transfer and transferred the case to the Western District of Washington. The Nevada Court declined to address Defendants' pending Motion to Dismiss because the Nevada Court granted the Motion to Transfer. *See* ECF 15 at 1.

6. On December 15, 2023, the case was assigned to the Hon. Brian A. Tsuchida in the Western District of Washington, Case No. 2:23-cv-01932-BAT.

7. Defendants need to update their pending Motion to Dismiss to provide Washington-specific authorities for certain arguments.

8. The parties have conferred and agreed to the following briefing schedule for Defendants' updated Motion to Dismiss:

- a. Defendants' Motion to Dismiss deadline: January 18, 2024
- b. Plaintiffs' Opposition deadline: February 15, 2024
- c. Defendants' Reply deadline: February 22, 2024

9. The stipulated extension is necessary to provide adequate time for counsel to revise the previously pending Motion to Dismiss and to file in the Western District of Washington.

10. This is the parties' first request for an extension pursuant to the transfer. This stipulated briefing schedule is made in good faith and not for purposes of delay.

DATED this 16th day of January 2024.

PERKINS COIE LLP

RIKLIS LAW, PLLC

By: /s/ David A. Perez
David A. Perez, WSBA No. 43959
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.6767

By: /s/ Kristofer Riklis
Kristofer Z. Riklis, Esq.
Nevada Bar No. 14754
871 Coronado Center Dr., Suite 200
Henderson, NV 89052

JOINT STIPULATION FOR MOTION TO DISMISS
BRIEFING SCHEDULE – 2 (No. 2:23-cv-01932-BAT)

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1 Fax: 206.359.7767

Email: Kristofer@riklistlaw.com

2 DPerez@perkinscoie.com

*Attorneys for Plaintiffs Christopher J.
Hadnagy and Social-Engineer, LLC*

3 Matthew J. Mertens (*Admitted Pro Hac Vice*)

1120 N.W. Couch Street Tenth Floor

4 Portland, OR 97209-4128

Phone: 503.727.2199

5 Fax 503.346.2199

6 MMertens@perkinscoie.com

7 Lauren A. Trambley (*Admitted Pro Hac Vice*)

505 Howard Street, Suite 1000

8 San Francisco, CA 94105-3204

Phone: 415.344.7000

9 Fax: 415.344.7050

10 LTrambley@perkinscoie.com

11 *Attorneys for Defendants Jeff Moss and DEF*
12 *CON Communications, Inc.*

13 IT IS SO ORDERED.

14 Dated this 16th day of January, 2024.

15 

16 BRIAN A. TSUCHIDA
17 United States Magistrate Judge